

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOHN MARTINEZ,)	
)	
Plaintiff,)	Case No. 23-cv-01741
)	
v.)	Honorable Thomas M. Durkin
)	
REYNALDO GUEVARA, et al.)	Honorable Magistrate Sheila M. Finnegan
)	
Defendants.)	

**JOINT STIPULATION REGARDING MOTION TO COMPEL THIRD-PARTY
COOK COUNTY STATE’S ATTORNEY TO COMPLY WITH SUBPOENA**

Defendants, Hector Vergara, Randy Troche, Edward Mingey, Geri Lynn Yanow, as special representative for Ernest Halverson (deceased) and Joseph Mohan (deceased), and Kevin Rogers as special representative for Francis Cappitelli (deceased) (collectively “Defendant Officers”), and Third-Party Cook County State’s Attorney’s Office, by their respective counsel, stipulate to the following:

1. Currently pending is Defendant Officers’ Motion to Compel Third-Party Cook County State’s Attorney to Comply with Subpoena. (Dkt. 129.) The Cook County State’s Attorney’s Office responded to the motion to compel on February 29, 2024 and Defendant Officers’ reply is due to be filed on March 14, 2024.
2. The parties recently engaged in renewed discussions about potential resolution of Defendant Officers’ motion and as a result, agree and stipulate to the following:
 - a. Cook County State’s Attorney’s Office agrees to produce the underlying criminal file for all three criminal defendants (Plaintiff Martinez, Thomas Kelly, and Jose Tinajero) on or before April 4, 2024;

- b. Cook County State's Attorney's Office agrees to produce the remaining Post-Conviction and Certificate of Innocence files no later than May 14, 2024, provided all pending Post-Conviction and Certificate of Innocence proceedings are disposed of prior to May 1, 2024;
- c. With regard to Defendant Officers' request for communications, the parties will meet and confer regarding parameter for discovery of electronically stored information; and
- d. Based on these representations, Defendant Officers withdraw their motion to compel without prejudice.

Dated: March 14, 2024

/s/ Laura M. Ranum
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Special Assistant Corporation Counsel for
Defendants Troche, Vergara, Mingey, and
Special Representatives Yanow and Rogers

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I, hereby certify under penalty of perjury pursuant to 28 U.S.C.A. § 1746 that the foregoing is true and correct, that on March 14, 2024, I electronically filed the forgoing **Joint Stipulation Regarding Motion to Compel Third-Party Cook County State's Attorney to Comply with Subpoena** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following CM/ECF participants listed in the below service list.

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